IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.	
v.	:	DATE FILED:	
STEPHAN L. SCHNEIDER	:	VIOLATION:	

18 U.S.C. § 2314 (interstate transportation

of stolen property - 1 count)

18 U.S.C. § 2 (aiding and abetting)

Notice of forfeiture

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

BACKGROUND

- 1. At all times material to this information, defendant STEPHAN L. SCHNEIDER held himself out as the owner of a company called Community Financial Management Services ("CFMS"), located in Haddon Township, New Jersey, which he claimed assisted clients with accounting, tax preparation, and negotiations with the United States Internal Revenue Service ("IRS").
- 2. In or about April 2012, defendant STEPHAN L. SCHNEIDER negotiated with the IRS a payment plan for CFMS clients A.P. and R.P., located in Pennsylvania, who had an outstanding tax debt. Under this payment plan A.P. and R.P. were to pay the IRS \$2,500 a month from April 2012 through October 2012, and then \$500 a month after that.
- 3. Defendant STEPHAN L. SCHNEIDER directed A.P. and R.P. to mail the monthly IRS payment checks to him, some of which were made payable to the IRS, and said that he would forward payment to the IRS.
 - From April 2012 to February 2013, A.P. and R.P. sent defendant 4.

STEPHAN L. SCHNEIDER ten checks totaling \$14,500. Defendant STEPHAN L. SCHNEIDER only sent \$2,500 to the IRS, and kept the balance of the money, using it on other expenses unrelated to A.P. and R.P.'s tax debt.

From in or about April 2012 to in or about February 2013, in Springfield,
Pennsylvania, in the Eastern District of Pennsylvania, and elsewhere, defendant

STEPHAN L. SCHNEIDER

knowingly transported, transmitted, and transferred, and caused to be transported, transmitted, and transferred, in interstate commerce, from Springfield, Pennsylvania, to New Jersey, goods and merchandise with a value in excess of \$5,000.00, that is, checks with a total value of at least \$12,000, knowing the checks to have been stolen, converted and taken by fraud.

In violation of Title 18, United States Code, Sections 2314 and 2.

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Section 2314,
set forth in Count One of this information, defendant

STEPHAN L. SCHNEIDER

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense, as charged in this information.

- 2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:
 - (a) cannot be located upon the exercise of due diligence;
 - (b) has been transferred or sold to, or deposited with, a third party;
 - (c) has been placed beyond the jurisdiction of the Court;
 - (d) has been substantially diminished in value; or
 - (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461.

ZANE DAVID MEMEGER

United States Attorney